1 MARKMAN LAW **CAMPBELL & WILLIAMS** 2 DAVID MARKMAN (Nevada Bar. No. 12440) J. Colby Williams, Esq. (Nevada Bar No. David@Markmanlawfirm.com 5549) 3 4484 S. Pecos Rd. Suite #130 icw@cwlawlv.com Las Vegas NV 89121 710 South Seventh Street, Suite A 4 Telephone: 702-843-5899 Las Vegas, Nevada 89101 Facsimile: 702-843-6010 Telephone: (702) 382-5222 5 Facsimile: (702) 382-0540 **GUTRIDE SAFIER LLP** 6 SETH A. SAFIER (admitted pro hac vice) WILSON SONSINI GOODRICH & seth@gutridesafier.com ROSATI 7 MARIE A. MCCRARY (admitted pro hac vice) **Professional Corporation** marie@gutridesafier.com VICTOR JIH (admitted *pro hac vice*) 8 HAYLEY REYNOLDS (admitted pro hac vice) vjih@wsgr.com hayley@gutridesafier.com SUSAN K. LEADER (admitted pro hac 9 ANTHONY J. PATEK (admitted pro hac vice) vice) anthony@gutridesafier.com sleader@wsgr.com 10 KALI BACKER (admitted pro hac vice) 633 West Fifth Street, Suite 1550 kali@gutridesafier.com Los Angeles, CA 90071-2027 11 100 Pine Street, Suite 1250 Telephone: (323) 210-2900 San Francisco, CA 94111 Facsimile: (866) 974-7329 12 Telephone: (415) 336-6545 Facsimile: (415) 449-6469 Attorneys for Defendant Zuffa, LLC 13 Attorneys for Plaintiff 14 15 UNITED STATES DISTRICT COURT FOR NEVADA 16 Case No.: 2:22-cv-00412-RFB-BNW EVERETT BLOOM, on behalf of himself, and those similarly situated, 17 JOINT STIPULATION RE: LEAVE TO AMEND COMPLAINT Plaintiff. 18 19 v. ZUFFA, LLC, 20 Defendant. 21 22 23 This stipulation is between Plaintiff, Everett Bloom, on behalf of himself, the general 24 public and those similarly situated ("Plaintiff") and Zuffa, LLC ("Zuffa") (together, the 25 "Parties"). The Parties have agreed as follows: 26 WHEREAS, Plaintiff filed a motion for leave to amend the complaint (ECF 42) on April 27 28, 2023. 28

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WHEREAS, the Court dismissed without prejudice the motion for leave to amend on May 5, 2023 (ECF 43) and ordered the Parties to meet and confer by May 26, 2023 in accordance with LR IA 1-3(f).

WHEREAS, the Parties met and conferred regarding the motion for leave to amend on May 10, 2023 per LR IA 1-3(f).

WHEREAS, Zuffa does not oppose Plaintiff's request to file an amended complaint that conforms to the proposed amended complaint filed on April 28, 2023 but requests that Zuffa and the new defendants be provided 30 days to file responsive pleadings and/or motions.

WHEREAS, Plaintiff's amendment will not delay the stipulated deadline for Plaintiffs to file their motion for class certification, as reflected in the Case Management Order (ECF 32) and Joint Stipulation to Continue Deadline for Class Certification (ECF 40 & 41). Therefore, the Parties hereby stipulate as follows:

- Plaintiff shall have leave to file, by May 30, 2023, or other date set by the Court, an amended complaint that conforms to the proposed amended complaint filed on April 28, 2023;
- Zuffa and the new defendants shall have 30 days from the date of filing of the amended complaint to file any responsive pleadings and/or motions.

STIPULATED AND AGREED to this 23rd day of May 2023.

By: /Anthony J. Patek/

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5	Atto	rneys for Defendant Zuffa, LLC	
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8	IT IS SO ORDERED		
9	DATED: 2:44 pm, May 24, 2023	DATED: 2:44 pm, May 24, 2023	
10	ρ	R	
11	Brenda Weksler United States Magistrate Judge		
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